

From: [Dan Peacock](#)
To: [Bob Stoddard](#)
Cc: [John Hebert](#); [Laura Parsons](#); [Russell Wasem](#); [Jennifer Gaines](#); [Gene Benbow](#); [Scott Garrison](#)
Subject: Re: Rodenticides
Date: 10/25/2011 10:41 AM

Dear Mr. Stoddard,

The RMD was mute about specific text for bait stations products.

However, we required the highlighted text below on complying bait stations as a logical extension of the May 18, 2008, RMD (#3) or as a result of questions arising during the review of products attempting to comply with the RMD (#7 and #9) .

We have not posted these requirements on a website.

The unhighlighted text below is text that we would have required prior to the RMD for bait station products.

1. product name
2. reg. number
3. required text for the specific tier level that also appears on Front Panel of Outer Label per RMD. [We do not mention a specific tier number.]
4. active ingredient statement
5. Signal word
6. referral to full labeling
7. "Do not allow children or pets to play with the bait stations" (Tier 1, 2, and 3). or "Keep Out of Reach of Children" (Tier 4)
8. Net weight of block
9. "This bait station can only be refilled with the block bait sold with this station. [refillable stations only]

If you have additional questions, let me know.

Thank You,

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

▼ [Bob Stoddard ---10/25/2011 09:27:28 AM---When did this change go into affect? What regulation or law is this under? Can you provide me a li](#)

From: Bob Stoddard <bob@envirosafeipm.com>
To: Russell Wasem/DC/USEPA/US@EPA
Cc: John Hebert/DC/USEPA/US@EPA, Dan Peacock/DC/USEPA/US@EPA,
Laura Parsons/DC/USEPA/US@EPA
Date: 10/25/2011 09:27 AM
Subject: Re: Rodenticides

When did this change go into affect? What regulation or law is this under? Can you provide me a link to a website that discusses these requirements? Also, prior to this recent change what were the requirements for labeling a bait station? Thanks so much I am doing a presentation for schools and want to make sure I provide accurate information.

Bob

Sent from my iPhone

On Oct 25, 2011, at 8:39 AM, Wasem.Russell@epamail.epa.gov wrote:

>
> Good Morning Bob,
>
> Please see the email below for what is required to be on bait stations.
> If you have any further labeling or registration questions, please
> contact my colleagues Dan Peacock and John Hebert (Both CC'ed).

> Regards,

> Rusty_____

>
> Rusty Wasem / Chemical Review Manager
> Risk Management & Implementation Branch 1*
> Pesticide Re-evaluation Division* / Office of Pesticide Programs
> 703 / 305 6979
> ----- Forwarded by Russell Wasem/DC/USEPA/US on 10/25/2011 08:12 AM

> -----

>
> From: John Hebert/DC/USEPA/US
> To: Russell Wasem/DC/USEPA/US@EPA
> Cc: Dan Peacock/DC/USEPA/US@EPA, Laura Parsons/DC/USEPA/US@EPA
> Date: 10/25/2011 08:08 AM
> Subject: Re: Fw: Rodenticides

>
> here is what we would require on the bait station label:

- >
> 1. Product name and reg. number.
> 2. Active ingred statement
> 3. Signal word
> 4. referral to full labeling
> 5. What Tier level it is

>
>
>
>
> From: Russell Wasem/DC/USEPA/US
> To: Dan Peacock/DC/USEPA/US@EPA, John Hebert/DC/USEPA/US@EPA
> Cc: Laura Parsons/DC/USEPA/US@EPA
> Date: 10/25/2011 08:00 AM
> Subject: Fw: Rodenticides

>
>
> Is there guidance somewhere for what must be on a bait station's label?
>
> Rusty_____

> _____

> ----- Forwarded by Russell Wasem/DC/USEPA/US on 10/25/2011 07:58 AM

> -----

>
>
> From: Bob Stoddard <bob@envirosafeipm.com>
> To: Russell Wasem/DC/USEPA/US@EPA
> Date: 10/24/2011 08:21 PM
> Subject: Re: Rodenticides

>
>
>
> Just trying to see if there is specific requirement for what labeling
> should be on a protecta rtu station once it is installed. Is the
> printing that comes on the rtu sufficient or is it required to have
> additional information? According to the rodenticide label it just
> states it must be placed in childproof station. Reading label
> requirement it appears that the protecta rtu meets this requirement.
> Thanks for your help.

>
> Bob

>
> Sent from my iPhone

>
> On Oct 24, 2011, at 8:04 PM, Wasem.Russell@epamail.epa.gov wrote:

>
>> Good Evening Bob,
>>
>> Are you inquiring about whether an abbreviated label can be placed on
>> bait stations or are you looking for the protocols for demonstrating
>> tamper resistance of the bait station? If you are looking for the
>> protocols, please see the end of the Risk Mitigation Decision for Ten
>> Rodenticides (attached). Please let me know if you are inquiring
> about
>> an abbreviated label or something else.
>> (See attached file: Risk Mitigation Decision.pdf)

>>
>> Regards,
>>
>> Rusty_____

>>
>> Rusty Wasem / Chemical Review Manager
>> Risk Management & Implementation Branch 1*
>> Pesticide Re-evaluation Division* / Office of Pesticide Programs
>> 703 / 305 6979

>>
>>
>>
>>
>> From: Bob Stoddard <bob@envirosafeipm.com>
>> To: Russell Wasem/DC/USEPA/US@EPA
>> Date: 10/24/2011 01:23 PM
>> Subject: Rodenticides

>>
>>
>>
>> Dear Sir,